

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHAIM KAPLAN, *et al.*,

USDC SDNY
DOCUMENT
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DATE FILED: 6/30/2022

Plaintiffs,

-against-

LEBANESE CANADIAN BANK, SAL,

Defendant.

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SCHEDULING ORDER

08-CV-7253 (GBD) (KHP)

KATHARINE H. PARKER, United States Magistrate Judge:

On June 30, 2022, the parties in the above captioned action appeared for an Initial Case Management Conference. After review of the pleadings and consultation with the parties, the following Scheduling Order is entered pursuant to Rule 16 of the Federal Rules of Civil Procedure:

Pleadings, Parties, and Motions. There shall be no further amendments of the pleadings or joinder of parties absent agreement between the parties or a Court order.

Discovery. The deadline to complete fact discovery is June 30, 2024. The deadline to complete expert discovery is December 31, 2024.

Interim Discovery Deadlines. The parties have represented that initial disclosures have been produced. Initial document requests, interrogatories, and requests for admission may be served immediately, but no later than 30 days prior to the discovery deadline. Responses to discovery requests shall be provided as outlined by the Federal Rules of Civil Procedure and the Local Rules of United States District Courts for the Southern and Eastern Districts of New York. All fact depositions shall be completed by June 30, 2024. The parties are limited to no more than ten depositions per party absent an agreement between the parties or an order from the

Court. Third party discovery may commence immediately. Interim deadlines may be adjusted by the parties on agreement without further order of the Court.

Discovery Disputes. The parties shall follow the Court's Individual Procedures with respect to any discovery disputes. See <https://nysd.uscourts.gov/hon-katharine-h-parker>.

Rule 1 and Rule 26(b)(1). Counsel shall comply with Rule 1 and Rule 26(b)(1) in the conduct of discovery.

Document Requests. Counsel shall be fully familiar with their obligations under Rules 34 and 26(g) and consider and discuss ways to ensure compliance and minimize disputes regarding overbreadth and specificity of requests and responses. A failure to comply with this responsibility carries serious consequences. Requests for any and all documents on a broad topic are presumptively improper. Likewise, courts have held that an objection that does not appropriately explain its grounds is forfeited. *See, e.g., Wesley Corp. v. Zoom T.V. Prods., LLC*, 2018 WL 372700, at *4 (E.D. Mich. Jan. 11, 2018); *Fischer v. Forrest*, 2017 WL 773694 (S.D.N.Y. Feb. 28, 2017) (“[A]ny discovery response that does not comply with Rule 34’s requirement to state objections with specificity (and to clearly indicate whether responsive material is being withheld on the basis of objection) will be deemed a waiver of all objections (except as to privilege).”).

ESI Plan and Protective Order. The parties shall file a joint proposed ESI Plan and Protective Order by **July 29, 2022** for the Court’s review and adoption.

Status Letter. The parties shall provide the Court with a joint status letter, submitted electronically, by **August 12, 2022**.

SO ORDERED.

DATED: New York, New York
June 30, 2022

Katharine H Parker

KATHARINE H. PARKER
United States Magistrate Judge